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Horst Greczmiel  
Associate Director for NEPA oversight  
Council of Environmental Quality

Dear Mr. Greezmiel,

I greatly enjoyed participating in the Eastern Regional NEPA Roundtable meeting on November 13, 2003. The discussions were frank, open, and quite productive. In addition to my input on the ranking sheet you provided at the meeting, the following comments are submitted in response to your request for additional input.

#### Training

In several sections of the NEPA Task Force report recommend additional training in the NEPA process. I fully support these recommendations, but would like to emphasize that training should be focused toward field-level practitioners of NEPA. This is especially true regarding the use of Categorical Exclusions and Environmental Assessments.

#### Information management

All NEPA documents (EIS, EA's, CI) should be georeferenced and made publicly available in electronic form through a central database. Under the current system, it is extremely hard to obtain many documents and is often impossible to determine if a NEPA process has been conducted in a specific location or in similar situations. Nevertheless, the NEPA documents contain valuable environmental and historic information. An eventual goal should be that all Federal, State, and Local NEPA type documents should be available through a central, publicly managed, searchable database. This data base will not only assist in determining cumulative effects, but should also help reduce the cost and time needed for future NEPA evaluations.

#### Regional Categorical Exclusions (page 60)

Several sections of the Task Force Report indicate that most agencies approach the NEPA process in the widest possible geographic sense. Moreover, because of resource constraints agencies do not explicitly consider regional conditions or approaches when developing Categorical Exclusions or guidelines for developing EIS's or EA's. Nor are the studies georeferenced. Nevertheless, the Nation has a wide range of environmental conditions and ecosystems that must be managed in different ways. Furthermore, there has been a revolution in the use and analysis of spatial data (e.g. GIS, GPS..) since the development of the NEPA process. Therefore, in modernizing the NEPA process an increased emphasis should be placed on the development of guidelines that take into consideration local and regional environmental conditions. What may receive a categorical exclusion or EA in one ecosystem may not be appropriate for another. While it will be a significant multi-year challenge to develop

regional categorical exclusions and guidelines, the complexity of the environment necessitates that the all level of the evaluations be based on local and regional conditions.

#### Monitoring

Since the initial development of NEPA there has been a technological revolution in environmental monitoring and data acquisition. Moreover, spatially explicit, real time environmental data is widely available. Promote the use of this technology in the monitoring of NEPA projects is essential to adaptive management, evaluating cumulative impacts, and developing effective mitigations. In addition, all NEPA reports, including Categorical Exclusions and monitoring efforts, should be located in a georeferenced data base.

In summary, improving the NEPA process without eliminating the legislation's original intent is a challenging but rewarding, and ultimately necessary task. Open discussion is a key to this process and I am glad to have had the opportunity to be involved in the debate. If you have any questions regarding my comments, please don't hesitate to contact me directly.

Sincerely,  
F.N. Scatena

Professor and Chair  
Earth and Environmental Science